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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

COMMITTEE TO RECALL DAN
HOLLADAY, JEANA GONZALES, and
ADAM MARI,

Plaintiffs,

v.

JAKOB WILEY, City Recorder for the City of
Oregon City, in his official capacity,

Defendant;

and

STATE OF OREGON,

Intervenor.

Civil No.: 3:20-CV-01631-YY

**DEFENDANT'S JOINDER IN
INTERVENOR STATE OF OREGON'S
SECOND SUPPLEMENTAL BRIEF IN
SUPPORT OF ITS MOTION TO
DISMISS**

Defendant Jacob Wiley, City Recorder for Oregon City in his official Capacity ("the City") joins in and incorporates by reference the State of Oregon's Supplemental Brief in

Support of its Motion to Dismiss. *Pullman* abstention is appropriate because this is, at its heart, an election law case, and not a free speech case. There is, accordingly, no risk of chilling the free flow of information, and the state law claims at issue should be decided by state courts. The motions to dismiss should be granted, and Plaintiffs' motion to certify questions to the Oregon Supreme Court should be denied.

DATED: July 25, 2022

Respectfully submitted,

BATEMAN SEIDEL MINER BLOMGREN
CHELLIS & GRAM, P.C.

By: s/ Kevin S. Mapes
Kevin S. Mapes, OSB # 020079
Of Attorneys for Defendant Jakob Wiley

CERTIFICATE OF SERVICE

I hereby certify that, on July 25, 2022, I served **DEFENDANT’S JOINDER IN INTERVENOR STATE OF OREGON’S SECOND SUPPLEMENTAL BRIEF IN SUPPORT OF ITS MOTION TO DISMISS** on the following parties by using the court’s CM/ECF EFile and Notice of Filing System:

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Of Attorneys for Intervenor State of Oregon

DATED: July 25, 2022

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